

Certificate of Notice Page 1 of 4
United States Bankruptcy Court
Eastern District of Pennsylvania

Riggs,
Plaintiff

Adv. Proc. No. 19-00013-jkf

PA Housing Finance Agency,
Defendant

CERTIFICATE OF NOTICE

District/off: 0313-2

User: PaulP
Form ID: pdf900

Page 1 of 1
Total Noticed: 5

Date Rcvd: Apr 02, 2019

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Apr 04, 2019.

ust +BRENDA D. GISH, Office of United States Trustee - U.S. D, Federal Building,
228 Walnut Street, 11th Floor, Harrisburg, PA 17101-1714

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

ust +E-mail/Text: ustpreion03.ph.ecf@usdoj.gov Apr 03 2019 03:22:25 Frederic J. Baker,
Office of United States Trustee, 833 Chestnut Street, Suite 500,
Philadelphia, PA 19107-4405
ust +E-mail/Text: USTPRegion03.WL.ECF@USDOJ.GOV Apr 03 2019 03:22:24 SHAKIMA L. DORTCH,
U.S. Dept. of Justice - U.S. Trustee, 844 N. King Street, Suite 2207,
Wilmington, DE 19801-3519
ust +E-mail/Text: USTPRegion03.HA.ECF@USDOJ.GOV Apr 03 2019 03:22:25 United States Trustee,
228 Walnut Street, Suite 1190, Harrisburg, PA 17101-1722
ust +E-mail/Text: ustpreion03.ph.ecf@usdoj.gov Apr 03 2019 03:22:25 United States Trustee,
Office of the U.S. Trustee, 833 Chestnut Street, Suite 500, Philadelphia, PA 19107-4405
TOTAL: 4

***** BYPASSED RECIPIENTS *****

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Apr 04, 2019

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on April 2, 2019 at the address(es) listed below:

JADA S. GREENHOWE on behalf of Defendant PA Housing Finance Agency jgreenhowe@phfa.org
KEVIN G. MCDONALD on behalf of Creditor PENNSYLVANIA HOUSING FINANCE AGENCY
bkggroup@kmlawgroup.com
MITCHELL LEE CHAMBERS, JR. on behalf of Plaintiff Danielle Riggs ecfbccomcast.net,
paecfbcc@gmail.com

TOTAL: 3

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re	:	Chapter 13
Danielle Riggs	:	
DEBTOR	:	
	:	
Danielle Riggs	:	
	:	LEAD CASE No. 18-17963 JKF
vs.	:	
	:	Adversary Case No.19-00013 JKF
Pennsylvania Housing Finance Agency	:	
DEFENDANT	:	
	:	

CONSENT ORDER RESOLVING ADVERSARY CASE

Debtor, Danielle Riggs ("Debtor"), through counsel, Mitchell Lee Chambers, and the Pennsylvania Housing Finance Agency, Homeowner's Emergency Mortgage Assistance Program ("PHFA-HEMAP"), through its counsel, Jada S. Greenhowe, hereby consent to entry of the following ORDER:

1. Pennsylvania Housing Finance Agency ("PHFA") currently holds a valid first mortgage against Debtor's real property located at 1203 Crestview Road, Darby, PA 19023 (the "Property"). Debtor will continue to make the required monthly payments pursuant to the first mortgage to PHFA in accordance with the terms set forth in the mortgage and note.
2. Pennsylvania Housing Finance Agency also holds a valid second mortgage (the "PHFA-HEMAP Mortgage"), which is the subject of this adversary action, against the Debtor's Property.
3. The parties agree that the amount owed on the first mortgage may exceed the value of Debtor's Property and, as a result, the current value of the Property may not contain sufficient equity to support repayment of the PHFA-HEMAP Mortgage.
4. The PHFA-HEMAP Mortgage shall be deemed to have a secured claim in the amount of \$0.00 in Debtor's real property.

5. The PHFA-HEMAP Mortgage shall be treated as an unsecured claim in the approximate amount of \$21,893.00 and shall be entitled to receive in the pro rata distribution to unsecured creditors through the Debtor's Chapter 13 Plan.
6. Upon completion of Debtor's Chapter 13 Plan the PHFA-HEMAP Mortgage shall be declared null and void.
7. PHFA-HEMAP shall be provide an executed satisfaction piece that Debtor may record with the office of the recorder of deeds within sixty (60) days from the date of entry of a discharge order pertaining to the underlying bankruptcy case.
8. PHFA-HEMAP shall only be required to release the PHFA-HEMAP Mortgage so long as the Debtor receives a Chapter 13 Discharge, as evidenced by the entry of a discharge order.
9. Should the Debtor fail to obtain a Chapter 13 Discharge, if this Chapter 13 bankruptcy converts to a Chapter 7 bankruptcy, if the Property is sold or if any lien, mortgage or encumbrance superior in priority to that of the PHFA-HEMAP Mortgage is refinanced, the PHFA-HEMAP Mortgage shall survive and this agreement shall be deemed null and void without further order of this Court.
10. Counsel for Debtor hereby withdraws his Request for Production of Documents ("Request for Production") filed on March 1, 2019.
11. Neither PHFA nor PHFA-HEMAP shall be required to file or otherwise provide responses to the Request for Production or provide the documents requested pursuant to the Request for Production.
12. That upon the signing and approval of the Court of this consent order it is hereby ORDERED that the Adversary Action is closed.

THIS SPACE INTENTIONALLY LEFT BLANK

/s/ Mitchell Lee Chambers, Esq.

Mitchell Lee Chambers, Esq.

Counsel for Debtor

Date: 3/27/19

/s/ Jada S. Greenhowe, Esq.

Jada S. Greenhowe, Esq.

Counsel for Pennsylvania Housing Finance Agency

Date: 4/1/2019

AND NOW, this 2nd day of April, 2019, it is hereby ORDERED that
the foregoing Stipulation is approved, ~~shall be, and is made an Order of this Court.~~

BY THE COURT:



HONORABLE JEAN K. FITZSIMON
UNITED STATES BANKRUPTCY JUDGE